

MEMO ENDORSED

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September 24, 2020

Hon. Nelson S. Román  
United States District Court  
300 Quarropas Street  
White Plains, New York 10601

Re: *United States v. Kevin Herbin*  
15-cr-5 (NSR)-08

Dear Judge Román:

This letter is an application to adjourn the above VOSR matter, currently calendared for September 25, 2020, to a date during the week of January 18, 2021.

The reason for the request is that Mr. Herbin has a more recent case, *United States v. Jones, et al (Herbin)*, 19-cr-700 (VB), which is the basis for a number of the VOSR specifications in the present matter. Mr. Herbin has entered a plea of guilty in the newer case and his sentencing has been scheduled for approximately January 11 or January 13, 2021. The defense wishes to have the VOSR proceeding resolved following sentencing on the newer matter and also requires additional time to confer with Mr. Herbin and with his counsel on the newer matter prior to resolving the VOSR.

I have conferred with AUSA Shiva Logarajah who advises me that the government does not object to this application.

Very truly yours,

/s/ *Theodore S. Green*  
Theodore S. Green

